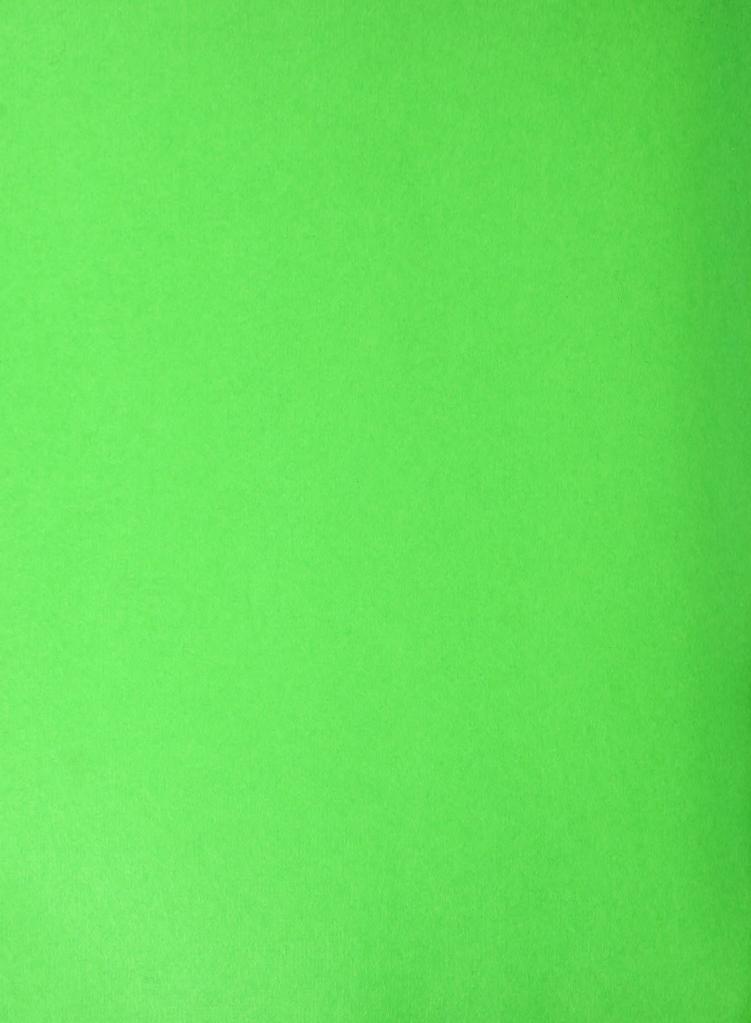
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BOONE

Housing Element



HOUSING ELEMENT FOR THE

TOWN OF BOONE

March, 1978

Division of Community Assistance



SUMMARY STATEMENT

OF

HOUSING ELEMENTS

In accordance with #600.70 (a) (1) through (4), #600.70 (b) (3) (i) through (iii), and #600.67 (b) of the Federal Register, Vol. 40, No. 164 dated August 22, 1975, the following depicts the summary statement comments:

- 1. Take into account all available evidence of the assumptions and statistical bases upon which the projection of zoning, community facilities, and population growth is based: This housing element relies heavily upon a 1977 land use survey and 1970 Census figures. Utilizing township population projections in the city's recently completed land development plan, projections for the city to the year 2000 were made ensuring consistency between them and the regional growth figures used by the Region D COG was maintained.
- 2. Provide for the elimination of the effects of discrimination in housing based on race, color, religion, sex, or national origin and provide safeguards for the future: Efforts to promote expanded housing opportunities for all have been made in the form of zoning amendments, hiring a code enforcement officer with broadened responsibilities, and the conduction of a community goals survey to be utilized by city officials on a broad scope of problems. Enforcement of insulation standards in accordance with the North Carolina Building Codes began on Janualy 1, 1978.
- 3. Take into account the need to preserve existing housing and neighborhoods through such measures as housing preservation, rehabilitation, changes in tax policies and building codes, improvements in housing management and maintenance, and the

provision for adequate municipal services. Many of the implementation proposals stress rehabilitation efforts, the creation and maintenance of neighborhood groups, changes in tax policies to encourage the upgrading of properties, and the need to link expanded housing opportunities with adequate community facilities.

- 4. Develop and carry out policies, procedures, and mechanisms necessary for coordinating local, area wide, and State housing policies with functional planning and capital investment strategies: Increased cooperative efforts, promoting Section 8 housing, between the Town of Boone and Watauga County are stressed. Recently adopted subdivision regulations and a zoning ordinance were designed to be harmonious with those enforced by the county. Both of these will have a positive effect on new housing to be built. Expanded concepts are promoted linking the city with applicable Farmers Home Administration (FmHA) programs.
 - (i) Identify the housing needs of the current and prospective population by appropriate geographic sectors and identifiable segments of the population and provide for the distribution of housing resources (including assisted housing) to meet the needs of all citizens, in order to provide a choice of housing types and location: Based on previously discussed population projections, housing needs of assisted and non-assisted households were determined. The number of needy households were further broken down into segments (Elderly, Family, Large Family) up to the year 2000. Where such housing would conceivably be built was linked with areas discussed in the land development plan. Substandard housing location (to be linked with FmHA or Section 8 programs) were identified on a housing map.
 - (ii) Develop public-private policies, strategies, and implementation activities necessary to accomplish housing goals and objectives, including the provision of essential public facilities

- and services: Specific steps designed to bring to fruition the quantifiable objectives over a three (3) year period are outlined. Along with these strategies, the general idea behind such a step is discussed.
- (iii) Take into account the housing planning activities and plans undertaken pursuant to Titles I and II of the Housing and Community Development Act of 1974 in developing the housing element: the Town of Boone has obtained a Community Development Grant for the Junaluska area. The Title II portion (dealing with Section 8 housing) is stressed heavily in the objectives portion.
 - b. The elements shall specify broad goals and annual objectives; programs designed to accomplish the objectives; and procedures including criteria set forth in advance, for evaluating programs and activities to determine whether the objectives are being met: based on ideas suggested as reasonable at an announced meeting designed to gather together knowledgeable people, goals were agreed upon and quantifiable objectives put forth; necessary procedures designed to actualize the objectives were enumerated in a sequential order, by year. Criteria and questions to assess the degree of success were specifically enumerated. Programs emphasized cooperative efforts between the public and private sector were designed in addition to individual programs for each.
- c. This plan is consistent with the Area Wastewater Management Planning Assistance Program (208) of the Federal Water Pollution Control Act of 1972, the State Implementation Plan of the Clean Air Act of 1967, as amended, and the Statewide Comprehensive Outdoor Recreation Plan of the Land and Water Conservation Fund Act of 1965, as amended.

d. The Boone Land Development Plan and Housing Plan utilize the same demographic data, and have mutually supportive goals and objectives.

I. INTRODUCTION

A. Purpose, Scope, Use and Methodology

As a part of an ongoing comprehensive planning process, the Town of Boone is desirous of using the ensuing housing element as a part of its overall strategy to plan systematically for the future. Relying upon a windshield survey conducted by the Division of Community Assistance in the spring of 1977, the then identified housing conditions will be displayed in a Housing Assistance Plan (HAP) format for easy interpretation and possible subsequent use should the Town of Boone seek Community Development Funds.

The actual condition of housing will be augmented by a discussion of housing conditions using the 1970 Census of Housing. The findings from the survey and census presentation will be linked with community facilities where applicable. Suggested programs designed to impact upon inadequate housing conditions will be put forth. The origin of these suggestions will be a combination of strategies used in other communities, personal experiences, and concepts discussed with local community leaders and public input obtained from an "open house" at the town hall to discuss housing problems.

Many of the objectives mentioned in the report will be very specific so the town can easily assess the impact of one proposed project. In this manner, the housing plan will be the foundation upon which a strategy to improve housing conditions will be based. Used in this manner, the housing element will be continually updated to reflect the changes made.

B. Analysis of Existing Housing Studies and Activities

Housing Survey

One document which lends itself quite well to housing conditions within the Town of Boone is the recently completed Land Development Plan prepared by the Division of Community Assistance. While in several instances the actual number of housing units presented differs from the census data, the data presented below are more recent than those in the Land Development Plan.

	All Units	Owners	Renters
Occupied Units - Total	2344	11721	1172
Substandard	195	98	97
Standard	1944	972 ²	972
Vacant Units - Total ³	21	11	10
Substandard	2	1	1
Standard	19	10	9
Housing Stock Available	2365	1183	1182
Vacancy Rate	.89%	.89%	.89%

From Table 23 of the 1970 Census of Housing, the incidence homeownership among occupied units was 50%, $2344 \times .50 = 1172$.

Within the substandard category, 176 units (or 6.9%) are deteriorated and could be brought up to standard conditions. When the city is divided up into three different areas, the accompanying map and the following table more aptly depict the statistical data:

²From Table 23 of the 1970 Census of Housing, the percentage of units lacking some or all plumbing was 2.9%, therefore it was assumed to be 1.45% for each category.

³The percentage of vacant units was assumed to exhibit the same characteristics as the total housing stock.

TABLE II

AREA HOUSING CONDITIONS WITHIN BOONE

	1	2	3
Standard	409 (59%)	349 (46%)	289 (32%)
Deteriorated	102 (15%)	40 (6%)	34 (4%)
Dilapidated	13 (1%)	2 (.01%)	4 (.03%)
Vacant	7 (1%)	7 (.09%)	7 (.07%)
Mobile Homes	43 (6%)	138 (18%)	3 (.03%)
Apartments	125 (18%)	215 (29%)	578 (63%)
Total	699	751	915

In area comparisons Area 1 has twice the number of substandard units as the other two areas. Area 2 has three times the number of apartments at any other area, while number three possesses the largest number of mobile homes. The vacancy rate is so low (less than 1%) that there seems to be an excess of demand over supply. This could indicate a need for additional owner and renter occupied housing in the area.

II. HOUSING SUPPLY

A. Current Status of Housing Stock.

Rent and Value

Data from the 1970 Census of Housing indicate that the median value of owner-occupied housing in the State is \$12,800; inside SMSA's, it is \$15,900; in Watauga County - \$15,000; and within the Town of Boone - \$5,900. This figure is 39% that of the county, and 46% that of the State.

The percent of the housing in Boone occupied by renters is 43% of the total, and for Watauga County - 58.9%. The median rent for the county units is \$83.00 per month and for Boone \$37.00 per month.

Interior Conditions

Another important reflection of housing needs is lack of adequate plumbing facilities within the units. The following data are taken from the 1970 Census of Housing:

Housing Units with Inadequate Plumbing Facilities* (figures expressed as a percent of total)

	Renters		Owners
North Carolina		15.6	
Watauga County	17.2%		19%
Boone	2.6%		2.6%

*Best estimate based on Tables 23 and 60 from the Census of Housing.

The data indicate that Boone dwellers are far more likely to have full plumbing facilities than the county as a whole. Data is not available to indicate if owner-occupied or rental housing is substandard in plumbing facilities.

Another indicator of inadequacy is overcrowding - defined by the census as more than one person per room. The <u>1970 Census of Housing</u> reflects the following:

Overcrowded Conditions - 1.01 persons or more per room

	Total	With All Plumbing	Occupied Housing Units
North Carolina	(10.2%)	(63.7%)	1,509,564
Watauga County	433 (5.6%)	288 (96.3%)	7,704
Boone	95 (4.7%)	90 (95.5%)	2,043

Of note is that Boone's overcrowding is less than that of the State as a whole. This figure is complemented by the fact that 95.5% of those overcrowded units also have all plumbing facilities - a figure considerably higher than that of the State.

¹Specific breakdown not available, percentage expressed reflects year-round housing units.

Structural Age

The age of structures are of particular interest to housing planners. In general, older houses are more likely to need repairs, rehabilitation, or removal. Data from the 1970 Census of Housing reveal the following characteristics:

		Age of Ho	using			
	1939 or Earlier	1940- 1949	1950– 1959	1960- 1964	1965- 1969	1969- 1970
Watauga County	2018	1106	1449	1166	1490	475
Boone	413	276	498	368	394	99

of 2048 units, Boone has 413 (20.2%) which are of 1939 vintage or earlier while Watauga County with 7704 units, has 2018 units (26.2%) from the same period. Many older units will require either extensive renovation or demolition to meet present housing standards and those in future years. The Piedmont Triad Council of Governments has estimated that 25% of the pre-1950 units will have to be replaced by the year 2000. The percentage of pre-1950 units in Boone (689) is 33.6%. If twenty-five percent of these units must be replaced by 2000, then 172 units will fall into this category.

B. Status of Assisted Housing

Junaluska Community

This program has just begun and is being funded by a \$490,600 HUD Community Development Block Grant. The project will rehabilitate fifty-seven (57) units and demolish five (5) dilapidated units. Fifty-seven percent (57%) of the units in the area are substandard. New water and sewer lines, street improvements, and community clean-up will be major activities in the area. Many residents of the area are elderly, black, or have very low incomes. This program will impact upon one of the largest concentrations of substandard housing in Boone.

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Farmers Home Administration

When one links the variety of Farmers Home Administration (FmHA) programs to housing, three stand out: (1) FmHA 515; (2) FmHA 502; and (3) FmHA 504. Each could play an increasingly important role in providing decent housing for some of the low-to-moderate income families within the planning area.

The Section 515 program is available to interested construction companies for apartment construction. It is possible to combine this with the Section 8 rental subsidy program if the developer would be agreeable to signing an Annual Contribution Contract (ACC) with the Farmers Home Administration—which handles all Section 8 payments. There are presently no FmHA 515 projects proposed for the Boone planning area.

With the FmHA 502 program, a borrower can choose to have a house constructed according to FmHA standards, borrow 90 percent of the appraised value of the house if built under FmHA inspection, or borrow 100 percent to rehabilitate a substandard house to standard conditions. Any family with an income ranging from \$15,600.00 down to \$7,000.00 could be considered eligible. Through interest credits, the interest rate paid by each family varies to a low of one percent depending upon family income and size. Records at the Farmers Home Administration office in Boone reveal a total of nine such loans in the Boone vicinity.

While there are presently only one FmHA 504 loans within Boone, the positive aspects of the program warrant some discussion. Families are eligible if the annual adjusted gross income is less than \$5,000; the money is borrowed to upgrade a house that would still be considered substandard after renovation. The upper limit has recently been increased from \$3,500 to \$5,000 and if the applicant is 62 years of age or over, a maximum grant of \$5,000 can be made (if unable to assume a repayment schedule) and repairs are necessary for health and safety reasons. The maximum repayment period for a loan is twenty years; the interest rate is one percent.

Federal Land Bank

While not a source of low-interest money, the Federal Land Bank's rural home loan program does offer possibilities for potential purchases of homes in a rural setting (i.e., extraterritorially). Under this program, a person can procure up to a maximum of 85 percent of the appraised value of a house and lot so long as that value does not exceed \$60,000 (the privilege of borrowing, though, is available only to members and anyone desirous of joining may do so). The unsubsidized loan, tied into a variable rate mortgage (fluctuates as the money market does), can be financed over a forty year period, if necessary.

III. ENVIRONMENTAL/NEIGHBORHOOD QUALITY

Streets

Data available from the North Carolina Department of Transportation reveal that there are 8.99 miles of State maintained roads within the city limits, as well as 36.61 miles of locally maintained streets. With reference to the latter, 5.53 miles (or 15 percent) are unsurfaced. Most of this mileage is found in older neighborhoods in areas where few residences are located or areas which have just been opened up for development. Most of this mileage should be paved as demand warrants.

Water and Sewer

While there are several streets in Boone that are sewered by water lines of two inches or less in diameter (six inch lines are considered essential to ensure adequate water pressure at fire hydrants), most of these streets are serviced from adequately pressured hydrants. The exception to this will be identified in a mapping program currently in progress.

Most of Boone is presently served by the sewage treatment system. The most notable exception to this are several areas in the Junaluska community which have very old lines in need of repair. This work will be done with funds allocated through a CD grant received by Boone and Watauga County. Many of the sewer lines in Boone are of the 1930 vintage - terra cotta lines which have deteriorated over the years. A preliminary study by Moore Gardner Engineers indicate that many lines will need repair to eliminate groundwater infiltration into the system. The present sewage treatment plant is operating at or in excess of its design capacity. This situation has resulted in a limitation of the types of residential sewer hookups allowed by the Town of Boone. At the present time, only single family homes, duplexes, and up to four single bedroom apartments may hook up to the treatment system. Additional treatment capacity will be available when the old sewer lines are repaired and/or a new treatment section is added to the present sewage facility.

Recreation

Two and one half years ago, the Town of Boone and Watauga County formed a joint city/county recreation department with a recreation director. Year-round program include swimming, swim teams, dance classes, karate, soccer, baseball, basketball, wrestling, tennis, skiing, skating, volleyball and gymnastics. Present facilities include the Optimist Park and the central swimming facility. The department is presently writing a Bureau of Outdoor Recreation grant for six mini-parks throughout the county. These areas are sorely needed to provide recreation opportunities for local citizens of all ages.

IV. DEMAND FOR HOUSING

Population and Household Characteristics

Age: The 1970 Census of Population reveals the following data concerning the age of the population in Boone and Watauga County:

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Age Characteristics of the Population

Boone	1960	1970
Total Population	3,686	8,754
Ages: 0-5	5	335
5-19		3,204
20-64		4,821
65+		384
Watauga		
Total Population	17,529	23,404
Ages: 0-5		1,581
5-19		5,473
20-64		14,371
65+		1,979

Population Projections

Drawing upon statistics from the recently completed Watauga County Economic Development study and Boone Land Use Plan update, the following table depicts the projected population for the Town of Boone:

TABLE III
Boone Population Projections

1975 - 1990

Government Unit	1970	1975 (est)	1980	1985	1990
Boone	8754	12,077	15,400 ²	21,4932	27,5862
Watauga Co.	23,404	26,865 ²	30,3252	36,7132	43,100 ³
Town/County Ratio	37.4%	45%	50.8%	58.5%	64%

 $^{^{\}mathrm{1}}$ U. S. Department of Commerce, Bureau of the Census

²OBERS Series "E" Projections, Division of Community Services, N. C. Department of Administration

³Watauga County Land Development Plan

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Using the previously computed household size of 2.77, and assuming its continuation to the year 1990, the following table depicts the number of new households that will be formed within the city.

TABLE IV
New Households within Boone

	1980	1985	1990
Projected Households	5560	7759	9959
Less 1975 Households	4360	4360	4360
New Households	1200	3399	5599

Divide projected population by 2.77

This additional number of new households will require a tremendous increase in the housing stock by 1990. Data from the building inspector show a sizeable number of new residential structures being erected.

When one adds together the number of new dwellings needed to house the increased population and the 83 pre-1950 units (20% of the total pre-1950 units) that will eventually need to be rehabilitated or replaced between now and 1990, a total of 5,682 new housing units between now and 1990 exists. This represents an increase of 128% over that now existing. It should be noted, however, that a substantial number of new households will be students, which were counted by the 1970 census. These students, many of which will be housed on campus, inflate the totals shown above.

Some County Attitudes on County Services

As mentioned above, there exists a problem in assuring an adequate supply of good housing in the future. The opinions of county residents regarding services, listed below, must also be considered when formulating policy.

TABLE V

Citizen Attitudes on some Watauga County Services

Numbers listed as percents

		State		Wat	auga Co.	-
Housing	Poor	<u>Fair</u>	Good	Poor	Fair	Good
Avail. of Low-Income Housing	33	38	29	64	28	8
Avail. of Middle- Income Housing	19	44	37	17	54	29
Avail. of Rental Apts.	26	68	42	13	41	46
Social Services						
Quality of Child Welfare Service	13	49	38	12	50	38
Avail. of Asst. for Aged & Disabled	26	52	26	27	49	24
Avail. of Food Stamp Program	11	36	53	6	31	63
Avail. of Child Care Cent	23	59	36	17	45	38
Recreation						
Avail. of Public Parks & Playgrounds	33	33	34	22	35	43
Qual. of Public Parks & Playgrounds	29	36	35	17	30	53

Source: North Carolina, <u>Today and Tomorrow</u>, Vol. 2, by James A. Christenson, NCSU, Nov. 1975.

In the Housing category, 36% of the county residents feel that the availability of low-income housing is fair or better while, for the State as a whole, the figure is 67%. For the availability of middle-income housing and rental apartments, the difference is less pronounced, 2% and 12% respectively. For both low-income housing and rental apartments, county residents were less pleased than State residents.

In the category of Social Services, county residents were more pleased with care for elderly and disabled and child care centers. The other two categories were very close in comparison.

Thus, county residents appear more satisfied with the availability of social services than with housing. This points out a need to upgrade the deficiencies through improved delivery mechanisms.

Race: The 1970 Census of Population indicates that out of a total population of 8,596, only 127 - 1.5% of the total - are blacks. Subsequently, it was felt that this number was too small a base for meaningful projections by race. Hence no discussion or tables make mention of this issue.

Household Size: The 1970 Census of Population indicates that the average household size is 2.77 persons per household in Boone. Assuming that the birth rate does not take a substantial upturn, one would expect somewhat smaller units in the future and an increase in mobile homes.

Smaller families and a larger percentage of senior citizens would tend to create a demand for smaller housing units. This trend is being reinforced with the mushrooming cost of the single family detached dwelling. One would expect that home ownership will be associated with high incomes, with families of more modest means residing in rented units, mobile homes, or rehabilitated dwellings.

<u>Income</u>: Data from the <u>1970 Census of Population</u> indicated that the median family income for North Carolina residents was \$7,774.00, annually; Watauga County - \$7,234: Boone - \$9,428. Boone residents enjoy a significantly higher family income than the county or State families.

An article appearing in the September 12 issue of <u>Newsweek</u> magazine indicates that about 50% of all families in 1970 could afford a median-priced home (\$26,000 in 1970), by 1977, only 25% of American families could afford the median home (\$52,300 today). Conversations

with local real estate people corroborate this data: new homes cost about \$40,000, while older homes are priced from \$35,000 - \$38,000. Bankers advance a rule-of-thumb formula for computing family income/home value as 2:1 or at most 2-1/2:1; meaning that the price of a home should not exceed 2-1/2 times the yearly family income. This indicates that many people will not be able to afford a dwelling more than \$23,000 - meaning a modular or mobile home, apartment, or rehabilitated house. The average mobile home measures 65' x 14' and is priced at \$13,300 - completely furnished. The least expensive - 36' x 12' - is priced at \$6,295. This translates to about \$14.55/square foot.

Monthly payments (including fuel, water, and electricity charges of \$34) would be \$164, over a 12-year period. Data is not available to determine the life span of a mobile home, but it would not be as long as a conventional dwelling.

Assisted Housing Needs of Current and Prospective Population

The following table depicts the housing assistance needs of the current population--based on data supplied by EMAD of HUD in Greensboro:

TABLE VI

Housing Assistance Needs of Lower Income Households in Boone and Watauga County

		Total (b-1)	Elderly (b-2)	All H Family (b-3)	louseholds Large Family (b-4)
Α.	Owner Households County	577	313	162	102
	Owner Households City*	2601	1412	73	464
В.	Renter Households County	680	76	552	52
	Renter Households City*	306 ⁵	346	247	238

Total - County	1257	389	714	154
Total - Boone	566	175	321	69

*Note: The reader is cautioned to remember that the city figures are based on reasonable assumptions about the relationship between the city and county's population.

 1 (577 owner households plus 680 renter households) x the percentage of people in the county who live in Boone (based on 1975 estimates) x 45% from Table I = (577 x .45) or 260.

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313 x .45 = 141 3 162 x .45 = 73 4 102 x .45 = 46 5 680 x .45 = 306 6 76 x .45 = 247 8 52 x .45 = 23

TABLE VII

Female Headed Households

		Total (c-1)	Elderly (c-2)	Family (c-3)	Large Family (c-4)
Α.	Owner Households - County Owner Households - Boone	101 45 ^a	65 29 ^b	30 14 ^c	6 2 ^d
В.	Renter Households - County Renter Households - Boone	248 117 ^e	93 44 [£]	118 56 ^g	37 17 ^h
	a ₁₀₁ x .45 = 45 b 65 x .45 = .29 c 30 x .45 = 14 d 6 x .45 = 2	f 93 g ₁₁₈	$x \cdot 45 = 117$ $x \cdot 45 = 44$ $x \cdot 45 = 46$ $x \cdot 45 = 17$		

Of the 566 households in Boone that appear to need some form of housing assistance, 260 (or 46% are owners and 306 (or 54%) are renters. This difference is helped somewhat by the fact that most of the housing assistance programs are directed at renters: of the 260 owner households, 54% are headed by the elderly.

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Of the 306 rental households that need assistance, 11% are headed by the elderly; families of four or fewer members made up 81%, and large families - 5 or more members - 8%. These small families represent the major rental housing need.

With reference to the female headed households, the 162 needy ones listed make up 29% of the total. Of these 162, 28% are owners and 72% are renters. Among owner households, the elderly and small families comprise 64% and 32%, respectively; large families made up only 4%. Among the renter households the figures were 38%, 48%, and 14%.

As the reader may recall, in the Population Projection section - it was calculated that 5,599 new housing units should be built between the present and 1990 to house the expanded population and replace 83 aged structures. Referring to Table VI, and assuming that the 566 needy households of a total of 4360 presently in Boone will carry forward until 1990 on a similar percentage basis, a total of $(566/4360 = 12.9\% \times 5599)$ 722 results - with 161 new needy households resulting.

To spread this total out by five year periods:

TABLE VIII

Present and Future Housing Needs of Low-Income

Families within Boone

	Tamilies within books			
	1977	1980	1985	1990
Present Need	566	~		
Future		241	241	240
Replacement	14	23	23	23
Total	580	264	264	263

If one further assumes that the percentages of housing needs established in Table VIII will remain the same through the year 1990, the following table results:

TABLE IX

Low-Income Housing Needs of Identifiable Segments

	<u>Total</u>	Elderly	Family	Large Family
1977	566	175	322	69
1980	240	74	137	29
1985	241	75	137	29
1990	241	75	137	29
Total	1288	399	733	156
Percent		31%	57%	12%

These data indicate a need of almost 1300 low-income housing units by 1990 to house the 12.9% of the population eligible for such services.

The next factor to be considered would be the location of these units. The areas to be mentioned are in general terms only and conform to the recently completed Land Development Plan. This section of that report is reproduced below:

Residential Land Use

Residential land use accounts for a large percentage of the developed land, as shown by Table 20. Boone's residential development pattern has been influenced by several factors.

First, the university has had an effect on housing location, spurring clustered multi-unit apartment houses and apartments above businesses near the university, indicating that students prefer to live close to both town and campus. In 1960 renter-occupied dwelling units accounted for 44% of total housing. The remaining 56% was classified as owner occupied (1960). General residential locations follow the pattern of the major highways (421 - 221, 321 and 105). Some single family dwellings are found near the perimeter of the city, but this type of housing begins to decline as distance from the city limits increases. Total densities are greater near the city limits in newer subdivisions which contain better housing

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than that in and around the CBD. Even so, housing conditions in Boone and Watauga County are relatively good. Boone had 12.5% substandard housing, Watauga County had 30.7% and North Carolina possessed 22.9% substandard housing units in 1960. The figures for 1971 are shown in Table 20. Approximately 75% of the housing within the corporate limits of Boone is in good condition or only in need of minor repair. Housing within the one mile perimeter is scattered with good and fair housing predominant. Poor housing is generally found clustered in small "pockets". These substandard housing units could be rehabilitated through a variety of federally-funded housing programs. This would conserve good quality, high density housing within the corporate limits of the town to support businesses in the CBD.

Much of the growth in the Boone housing stock is due to construction of apartment buildings and more mobile homes. The following tables emphasize this fact:

TABLE X

BOONE HOUSING CONDITIONS

DOOME	HOUSTNG	COMPTITI	DIAP
Standa	ird	983	
Deteri	lorating	186	
Dilapi	dated	21	
		1190	units
Mobile	Homes	213	
-	ces and	93	
Apar	tment B	ldgs	

Source: North Piedmont Field Office, "Windshield Survey", March, 1977.

TABLE XI

BOONE HOUSING	STOCK, 1970
Single Family	1163
Apartments	744
Trailers	136
	2043

Source: U. S. Census of Housing, 1970.

This expansion in the use of mobile homes should be more carefully controlled than in the past. Several parks have been built in the flood plain, a practice which invites disaster. Due to high densities in trailer parks, stringent design controls should be enforced to protect public health and safety.

Non-Assisted Housing Needs of Current and Prospective Population

Utilizing data supplied by EMAD of HUD in Greensboro, depicting owner occupied units with all plumbing, with 1.25 or less persons per room, and bought after 1939 or valued at \$7,500 or more in Watauga County and renter units with all plumbing and with 1.25 or fewer persons per room and paying 25 percent or less of their income for rent, the following table was produced. It has been assumed that all those families in these categories having as an upper income limit 20 percent higher than the 1977 updated figure of \$15,613 (\$9,428 x 138 x 1.2 = \$15,612.77) would represent the non-assisted population.

TABLE XII

Owner and Renter Non-Assisted Households

Total Households	Non-elderly Owners	Non-elderly Renters
Under \$2,760	204	17
\$2,760 - \$4,140	117	35
\$4,140 - \$6,900	443	123
\$6,900 - \$10,349	631	243
\$10,349 - \$13,799	460	155
\$13,799 - \$20,698	636	162
Total	2375 *x 1.17 = 2779	$735^* \times 1.17 = 860$

^{*(}Based on an upper income limit of \$15,613 = $$9,428 \times 1.38 \times 1.2$)

Total Households	Elderly Owners	Elderly Renters
Under \$2,760	421	54
\$2,760 - \$4,140	174	28
\$4,140 - \$6,900	135	7
\$6,900 - \$10,349	131	22
\$10,349 - \$13,799	72	7
\$13,799 - \$20,698	87	0
Total	1020 x 1.17 = 119	93 118 [*] x 1.17 = 138

^{*(}Based on an upper limit of $$15,613 = $9,428 \times 1.38 \times 1.2$)

TABLE XIII Housing Assistance Needs of Lower Income, Non-Assisted Households in Watauga County and Boone

All Households

		Total	Elderly	Family	Large Family
A.	Owner Households - County	3972	1193	1695	1084**
	Owner Households - Boone	1787 ¹	536 ²	763	4884
В.	Renter Households - County	860	138	440*	282**
	Renter Households - Boone	<u>587</u> 5	<u>116</u> 6	165	106 ⁸
	Total County	4832	1333	2135	1366
	Total Boone	2174	652	928	594

^{*}Assuming the ratio of total households/family is the same as Table IX

2
1193/3972 = .30
 3 1251 x .61 = 763
 4 1251 x .39 = 488
 5 860 x .45 = 387
 6 387 x .30 = 116

$$\frac{7}{271} \times .61 = 165$$

$$8_{271 \times .31} = 84$$

^{**}Assuming the ratio of total households/large family is the same as Table IX , or .39

 $^{^{1}4028}$ owner households x the number of people who live in Watauga County/number of people who live in Boone = .45

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TABLE XIV
Female Headed Households

			<u>Total</u>	Elderly	Family 3	Large Family
	A.	Owner Household - County	705	4542	2093	424
		Owner Household - City	314 ^a	202 ^b	98 ^c	14 ^d
	В.	Renter Household - County	3465	130 ⁶	1657	52 ⁸
		Renter Household - City	163 ^e	61 ^f	78 ^g	24 ^h
,	² 65, ³ 30, ⁴ 6/, ⁵ 24, ⁶ 93, ⁷ 11,	1/577 = .175 x /101 = .64 x /101 = .297 102 = .058 x 8/680 = .365 /248 = .375 8/248 = .476 /248 = .149	b 29 c 14 d 27 e 11 f 44	5/260 = .17 9/45 = .64 4/45 = .31 4/45 = .04 17/306 = .36 4/117 = .39 5/117 = .47 7/117 = .14	8 6 9	

Note: The procedure followed is identical to that used to derive the figures for non-assisted households.

In the All Households Table, note that the elderly comprise 30 percent of the non-assisted needy - among the assisted needy the figure was 54 percent. In the family category, 41 percent of the 1787 needy households are so classified - among assisted households, the comparable figure was 28 percent. Large families amounted 12 12 percent of the needy as compared to 17.6 percent of the assisted needy.

The data found in the Female headed Households is comparable to that discussed earlier, since the assumption was made that the percentages used in computing the assisted housing needs - based on reliable data from HUD - would be identical for non-assisted needs

In summary, the needy non-assisted households in Boone are

almost seven times as prevalent (1787/260) as the needy assisted households; among the elderly, the ratio is more than three to one (536/141).

In the Family category, the needy non-assisted households are 11 times as prevalent as the assisted households; among large families, the ratio is 10.5:1. Households comprised of four or fewer members comprise the largest percentage of the need followed by elderly and large families.

Referring to the previous table and assuming that the ratio of 2174 non-assisted households out of a total of 4360 presently in existence would continue until the year 1990, a figure of 2243/4360 = .499 x 5599 or 2792 needy non-assisted households ensures. This fact is emphasized by the following table.

TABLE XV

Present and Future Non-assisted Housing Needs of
Low-Income Families Within Boone

	1975	1980	1985	1990
Present Need	2174			
Future		502	836	836
Total	2174	502	836	836

If one assumes that the percentages established in Table XV will remain the same through the year 1990, the following results:

TABLE XVI

Non-Assisted Housing Needs of Identifiable Segments

	Total	Elderly	Family	Large Family
1977	2174	652	928	594
1980	502	151	214	137
1985	836	251	357	228
1990	836	251	357	228

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Total	4348	1305	1856	1187
Percent		30%	43%	27%

The preceding table emphasizes that 4348 new or rehabilitated structures will be needed between now and 1990 to meet the non-assisted housing needs of the future population. Of that amount, 2174, or 50% of the total all needed to house today's needy.

Earlier in this report, the cost of an average sized new house in Boone in 1977 was estimated to be \$40,000; the median price of a mobile home is about \$14.50 per square foot (based on a discussion with a mobile home dealer), the relationship to the 1977 estimated median income of \$13,010 shows a serious problem. Many households can no longer afford a single family dwelling and will be forced into rental housing, mobile homes, or modular housing.

Clearly, strategies need to be developed to deal with this problem.

V. HOUSING GOALS AND OBJECTIVES Goals for Meeting Existing and Future Housing Needs

In re-examining Table I, the low vacancy rate for owners and renters clearly presents a problem. To a certain extent, the potential owner can create a new vacancy (at least temporarily) if he can contract to have a new residence built. But this option is generally not available to the renter.

If an apartment complex is to be built in Boone, it seems essential for a large scale developer to initiate the construction as smaller builders in the city just don't have the financial resources to undertake such an effort. Should construction occur, there clearly seems to be a demand among the low and moderate income groups.

GOAL #1. Ensure an adequate supply of rental units is available for Boone residents of moderate income.

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Objective in Year 1. Encourage the private sector to construct twenty (20) rental units in the \$175-\$200 per month price range.

Implementation Activities

- Establish an ad hoc committee comprised of members in the construction, banking, real estate, etc. industries which will actively seek solutions designed to encourage the construction of moderately priced apartments.
- Make a determined commitment to carry out as many of the board's recommendations as possible.

Objective in Year 2. Encourage the private sector to construct forty-five (45) rental units in the \$175 - \$200 per month price range.

Objective in Year 3. Encourage the private sector to construct ten (10) to twelve (12) rental units in the \$175 - \$200 per month price range for moderate income families.

Implementation Activities

Profit from omissions and/or mistakes made in getting the first units underway and change tactics accordingly.

According to data developed by this report, there is reason to believe that seventy-five (75) to seventy-seven (77) apartment units could be filled if such construction were spread over a few years. The objectives put forth are not designed to meet the full potential because of the heavy financial commitment and the belief that a successful venture with a smaller number of units would lead to increased confidence the following year and later. Table XVI gives a close approximation of the identifiable segments that could benefit from such construction. Spread over a three (3) year period, 75 units are proposed for construction - 25 for the elderly, 25 for families, and 25 for large families. The quantifiable yearly objectives become the

criteria by which the town can measure the success of its efforts to promote construction of moderate income apartments.

GOAL #2. Ensure an adequate supply of rehabilitated owner-occupied and subsidized rental units are available to low- and moderate-income families of varying sizes.

Objective in Year 1. Encourage the private sector to construct ten (10) rental units for occupancy by Section 8 low-income families; five (5) for the elderly, three (3) for regular sized families, and two (2) for large families. This allocation roughly agrees with the percentage figures in Table III.

Implementation Activities.

- Acquaint the citizens of Boone with some of the housing problems through public educational meetings to be held by the town in the evenings.
- Use some of the personnel at the Watauga County Housing Authority to explain the benefits of Section 8 to potential recipients and its associated paperwork to developers and/or apartment owners.
- Utilize suggestions put forth by the ad hoc housing committee to create an environment conducive to construction.
- 4. Consider amending the zoning ordinance so as to encourage zoning bonuses these would be a form of compensation to developers who are willing to provide for low- or moderate-income housing. Bonuses may be in the form of increased density, waived set back requirements, etc.

Objective in Year 2. Through a combination of rehabilitating presently deteriorating or dilapidated owner-occupied units (for assisted and non-assisted owners) and subsidizing low-income renters who would conceivably occupy some of the present rental units as vacancies occur, create fifteen (15) suitable housing structures for low-income families. Sixty percent of these efforts

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should go to assisted households and forty percent to non-assisted.

Implementation Activities

- Set up the necessary machinery to create a Community Action Agency (CAA) which would employ CETA workers so that the monies obtained from the Farmers Home Administration (FmHA) can be used to mainly purchase supplies - the result being that a \$3,000 loan could go much further if CETA would provide the labor for such repairs.
- Working in conjunction with the FmHA, create an environment in which the benefits of FmHA programs become known to those considered most eligible.
- 3. Employ a CETA worker for the city who would function as a minimum housing code enforcement officer. His inspections would be linked to certain FmHA programs that could conceivably be used to correct some of the noted deficiencies. The housing rehabilitation officer working in the Junaluska area could be recruited for this job.
- 4. Encourage State legislators to modify tax laws that have the result of discouraging the improvement of rental property.
- 5. Using the previously mentioned CETA worker, shift from an attitude of code enforcement to one of assistance in code compliance. Housing assistance could then be viewed as a service provided by local government which would include technical assistance to understand the problems and the provision of financial counseling.
- 6. Work toward creating within the banking community a "pool" of money that could be made available at a preferential rate to assist clearly deficient households in weatherproofing their structure so as to obtain the maximum value from their energy dollars.

7. From the perspective of increasing the effectiveness of the local police, some degree of concern about the courts releasing of many youthful offenders on technicalities may be having the effect of discouraging owners and/or developers from creating more rental properties. One partial solution to this would be to obtain an experienced attorney who could instruct the local police force on some of the fine points of the law so that the constitutional rights of the accused would not be violated, thus minimizing the chance that the case would be dismissed on a legal technicality.

The FmHA Section 504 home improvement loan program offers an opportunity for qualified applicants to obtain a loan with an interest rate as low as one percent for a maximum of twenty (20) years. The money could be borrowed to rehabilitate a very much evident substandard unit to a less but still substandard condition. An outright grant is also a possibility.

The discussed Section 8 rental subsidy program allows low-income families who would not normally have the financial resources to occupy new or existing rental units. Based on a formula linking their income with the former to handle the Section 8 program) a predetermined sum, which when added to the amount paid by the renter, would maintain the landlord's profit margin.

Once such programs get underway, the criterion for measuring the success of the rehab or rental programs would be to compare those units actually improved against the quantifiable terms set forth in the objective.

Objective in Year 3. Through the leadership of lending institutions in the immediate area, market a graduated payment mortgage program so as to better enable aspiring young homeowners to acquire property. Efforts should be made to process ten (10) such loans this first year. Continue efforts to rehabilitate older housing within the city through appropriate FmHA programs. Seek fifteen (15) FmHA 502 loans and seven (7) FmHA 504 loans.

Implementation Activities.

- This activity would be interpreted as the private sector's response to meeting the housing needs of the upwardly mobile who are finding it more and more difficult each year to purchase a house.
- Continue promoting FmHA 502 and 504 programs to enable qualified households to purchase or rehabilitate housing.
- 3. Encourage the construction of a twenty (20) to forty (40) unit apartment complex under the FmHA 515 program (see page 9) and link it to the Section 8 programs to provide more subsidized apartments in Boone.
- 4. As housing conditions improve, direct recreational objectives toward the creation of parks around the city which would provide recreational areas for all age groups and work toward reinforcement of a neighborhood atmosphere.

The Secion 514 program, administered by the Farmers Home Administration, allows a profit or nonprofit corporation, or a housing authority, or an individual to borrow money for construction of housing. The developer borrows the money from the Farmers Home Administration and agrees to a repayment schedule that limits his rate of return to eight percent. It is possible to combine this program with the Secion 8 rental subsidies; under this concept a public housing authority could own a Section 515 project and lease the units under Section 8. The extent to which the Town of Boone would be able to achieve its objective of twenty (20) to forty (40) units would be the criterion for success.

GOAL#3. Create a positive neighborhood environment designed to foster a spirit of kinship among older and new residential areas of the city.

Objective in Year 1. Relying upon knowledgeable people within the community and with the city's backing, create neighborhood task forces to provide an improved communications flow between the city and its citizens.

Implementation Activities.

 Seek additional assistance from communities that have similar organizations such as the City of Raleigh.

Objectives in Year 2. Based on input from neighborhood task forces, create one park in an area with heavy concentrations of population and somewhat remote from the present recreational facilities.

Implementation Activities.

- 1. Obtain input on possible programs and activity areas from neighborhood chairmen who would obtain their ideas from the citizens of the neighborhood.
- Consider the recommendations of the task forces; obtain further insight from the N. C. Division of Parks & Recreation. Appropriate the necessary funds.

Objectives in Year 3. Continue to work with the various task forces to improve and help stabilize the neighborhoods of the city.

Implementation Activities

 As an additional inducement to encourage newcomers to settle within the city, consider tax incentives to those electing to build within the corporate limits.

Underlying all these attempts to encourage development is an inherent recognition that every effort to link adequate housing with adequate public facilities will be made. This would seem to be particularly appropriate for the elderly who quite often lack transportation means. Renewed efforts should be made to provide existing and new needy households with as many of the essential public services as the economics of the situation permit.

It seems reasonable that new goals and policies will be developed as events occur. These should likewise be converted into quantifiable terms so that the degree of success can be measured.

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These preceding paragraphs have presented several program options designed to assist Boone officials in formulating a policy on housing. It should be emphasized that these listings are only some of the more commonly used and extensive conversations with the appropriate governmental agencies should be made before a definite decision is reached.

VI. SUMMATION OF IMPLEMENTATION ACTIVITIES (for the Town Board)

The preceding sections have discussed housing conditions within the Town of Boone and a few of the minor deficiencies in some of the neighborhoods. Based on broad goals and more specific and quantifiable (in most cases) objectives, precise strategies were enumerated for a three year period of time which should help the city remedy some of the deficiencies noted.

The following is a summation by year of the implementation proposals which the town board should seriously consider if efforts to improve housing conditions are to begin.

YEAR 1

- Establish an ad hoc committee comprised of members in the construction, banking, real estate, etc., industries which will actively seek solutions designed to encourage the construction of moderatley priced apartments.
- 2. Make a determined commitment to carry out as many of the board's recommendations as possible.
- 3. Acquaint the citizens of Boone with some of the housing problems through public educational meetings to be held by the town in the evenings in the various neighborhoods.
- 4. Use some of the personnel at the Watauga County Housing Authority to explain the benefits of Section 8 to potential recipients and its associated paperwork to developers and/or apartment owners.
- 5. Utilize suggestions put forth by the ad hoc housing committee to create an environment conducive to construction.

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- 6. Consider amending the zoning ordiance so as to encourage zoning bonuses - these would be a form of compensation to developers who are willing to provide for low- or moderate-income housing. Bonuses may be in the form of increased density, waived set back requirements, etc.
- 7. Seek additional assistance from communities that have similar organizations such as the City of Raleigh.

YEAR 2

- 1. Profit from omissions and/or mistakes made in getting the first units underway and change tactics accordingly.
- 2. Set up the necessary machinery to create a Community Action Agency (CAA) which would employ CETA workers so that the monies obtained from the Farmers Home Administration (FmHA) can be used to mainly purchase supplies - the result being that a \$3,000 loan could go much further if CETA would provide the labor for such repairs.
- 3. Working in conjunction with the FmHA, create an environment in which the benefits of FmHA programs became known to those considered most eligible.
- 4. Employ a CETA worker for the city who would function as a minimum housing code enforcement officer. His inspections would be linked to certain FmHA programs that could conceivably be used to correct some of the noted deficiencies.
- 5. Speak to State Legislators about the need to modify tax laws that have the result of discouraging the improvement of rental property.
- 6. Using the previously mentioned CETA worker, shift from an attitude of code enforcement to one of assistance in code compliance. Housing assistance could then be viewed as a service provided by local government which would include technical assistance to understand the problems and the provision of financial counseling.
- 7. Work toward creating within the banking community a "pool" of money that could be made available at a preferential rate to assist clearly deficient households in weatherproofing their structure so as to obtain the maximum value from their energy dollars.
- 8. Some degree of concern about the courts' releasing of many young offenders on technicalities may be having the effect of discouraging owners and/or developers from creating more rental properties. One partial solution to this would be to obtain an experienced attorney who could instruct the local police force on some of the fine points of the law so that the constitutional rights of the accused would not be violated, thus minimizing the chance that the case would be dismissed on a legal technicality.

- 9. Obtain input on possible play equipment from neighborhood chairmen who would obtain their ideans from the citizens of the neighborhood.
- 10. Consider the recommendations of the task forces; obtain further insight from the N. C. Division of Parks & Recreation. Appropriate the necessary funds.

YEAR 3

- 1. Profit from omissions and/or mistakes made in getting the first units under way and change tactics accordingly.
- 2. Continue promoting FmHA 502 and 504 programs to enable qualified households to purchase or rehabilitate housing.
- 3. Encourage the construction of an eight (8) apartment complex under the FmHA 515 program and link it to the Section 8 programs to provide recreational areas for citizens and reinforce the neighborhood atmosphere.
- 5. As an additional inducement to encourage newcomers to settle within the city, consider tax incentives to those electing to build within the corporate limits.

As each of the years approaches an end, it would seem reasonable to reexamine the following year's objectives and make necessary modifications as circumstances dictate. It would also seem appropriate to then create new third year objectives so there would always be in place a clear visualization of housing strategies for at least a three year period.

The Boone Planning Board has sought and - in most instances - obtained invaluable input from knowledgeable local people in developing the yearly objectives. There was a universal recognition that more and better housing should be made available to low and moderate income families. It was felt that the implementation proposals were the essential catalysts necessary to "get the ball rolling". The planning board is ready to assist in any additional way it can; the rest is up to the Boone Board of Aldermen.

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APPENDIX

In addition to the assistance broadly outlined in the text, other programs and more in-depth explanations are:

- 1. Mobile homes may be utilized as Section 8 assisted housing, if the family rents the mobile home. "Tie Downs" are required. However, Secion 8 assistance is not available if the family owns its mobile home and only rents the pad on which it is located.
- 2. A public housing agency (PHA) is expressly authorized, with the approval of the Secretary, to assume all management and maintenance responsibilities of existing, new, or substantially rehabilitated Section 8 units, even if the agency also administers the Section 8 contract for the unit (Housing and Community Development Act of 1977).
- 3. The Housing and Community Development Act of 1977 contained provisions about a decrease in the FHA downpayment requirements; the new law requires a downpayment of 3 percent of the first \$25,000 and five percent of the appraised value over \$25,000.
- 4. The Housing and Community Development Act of 1977 permits Federal Savings and Loan Associations to make construction loans in amounts not exceeding the greater of (A) the sum of their surplus, undivided profits and reserves, or (B) five percent of their assets.
- 5. The limitation on real estate loans for single family dwellings which may be made by Federal Savings & Loan Associations is increased from \$55,000 to \$60,000.
- At least 60 percent of loans made pursuant to FmHA single family and rental loan programs are to be for the benefit of persons of low income.

APPENDIX I

ENVIRONMENTAL ASSESSMENT STATEMENT

Summary

The Housing Element of Boone contains background information on housing conditions and community facilities, projects future needs, proposes housing objectives and future growth patterns, and discusses implementation strategies.

Environmental Impact

Beneficial: More orderly use of land for numerous residential purposes is being promoted.

Adverse: Most development automatically impacts adversely with environmental constraints. Factors such as increased water run-off, the conversion of land in its natural state to that of an urban character, and indeed some of the decisions to offset these effects in themselves create adverse conditions. But by consideration of these factors and the intent to steer development into more suitable and less sparse areas, these impacts can be lessened.

Any Adverse Environmental Effects Which Cannot Be Avoided Should The Proposed Plan Be Implemented: Some adverse effects noted in 2 above will occur. Recognition of these and other impacts can lead to remedies designed to minimize these effects though.

Alternatives: The alternatives to the proposed goals and objectives would be: (1) not to have goals and objectives to encourage residential development in an orderly manner with consideration for the environment (i.e., an alternative having negative environmental effects), or (2) to encourage residential development of other types in other locations, at different intensities, or in different sequences. But in light of present development patterns, soil conditions, drainage network, etc., such a decision would do more damage than the planned orderly progression. The impact of the first alternative would tend to encourage urban sprawl and create environmental conditions that planning could have mitigated at worst or eliminated at best.

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Short-Term Use vs. the Maintenance of Long-Term Productivity: The overriding concept behind these policies is long-term but phased into two shorter termed intervals. By combining present land uses with local decisions about how nearby land can be used most productively, the trade off dilemna has become manageable.

Applicable Federal, State, or Local Environmental Controls:

Areawide Water Quality Management Planning.

National Historic Preservation Act of 1966.

National Environmental Policy Act of 1969.

Community Development Act of 1974: Environmental Review Procedures for the CDBG Program.

North Carolina Environmental Policy Act.

North Carolina Sedimentation Control Act.

Appalachian District Health Department Regulations.

No Proposed Deviations from HUD Environmental Policies are expected.

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NON-DISCRIMINATION SECTION

Pursuant to the requirements of Title VI of the Civil Rights Act of 1964 and Title VIII of the Civil Rights Act of 1968, this document provides for the elimination of the effects of discrimination in housing based on race, color, religion, sex or national origin.

ASSURANCES

- Assisted and non-assisted housing needs have been developed for all citizens, with special attention to women, families, large families, elderly, and minorities.
- 2. The Junalaska Community Development target area is being managed in a non-discriminatory manner with both minorities and non-minorities receiving the benefits of housing rehabilitation, better roads, and improved neighborhood environment.
- 3. The updated mobile home parks ordinance provides for mobile and modular homes with no exclusionary practices. The enforcement of this ordinance will be non-discriminatory.
- 4. Code enforcement is being and will be conducted in a fair and equitable manner.
- 5. Citizen input was gained without regard for race, color, religion, sex, or national origin. Future efforts will be conducted in the same manner.
- 6. All rehabilitation and new construction will be available to citizens without regard to race, color, religion, sex or national origin.
- 7. This level of government encourages Fair Housing Practices, and is opposed to redlining policies.

HOUSING ELEMENT CHECKLIST

Reg	uire	ements or Review Process Step			
			Federal Register Reference 600.73 (a)		Page
1.		ter of transmittal and enforsement and by Chief Executive			
2.	Summary statement, including:				
	a.	brief narrative description of how each land use and housing element has been met (see No. 3)	600.73	(c)	1-3
	b.	citation of supporting documents	600.73	(c), (d)	1-3
	с.	status of implementation action for each element (includes evidence	600.73	(e), (1)	1-3
		of official transmittal of Summary Statement copy to member units in the case of regional planning agencies)			
	d.	statement of consistency of land use and housing elements with each other	600.67	(b)	1-3
	e.	assurance that the required elements are consistent with the following programs as applicable:	600.73	(c,(6)	1-3
		(i) Area wide Waste Treatment Management Planning Assistance Program (208) of Federal Water Pollution Centrol Act of 1972			
		(ii) State Implementation Plan of Clear Air Act of 1967, as amended			
	((iii) State Comprehensive Outdoor Recreation Plan of Land and Water Conservation Fund Act of 1965, as amended			
3.	a.	data analysis and projected needs by geographic sectors	600.70	(a), (b)	4-26
	Ъ.	broad goals and measurable annual objectives	600.67	(b)	27-33
	с.	policies to eliminate discrimination	600.70	(a) (2)	27-33

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d. policies to preserve existing 600.70 (a), (3) 27-33 housing stock and neighborhoods e. indication of coordination mechanisms 600.70 (a), (4) 27-37 with other levels of functional planning, policy development and investment strategies 600.70 (b), (2) 27-37 f. defined policies, strategies, proposals to accomplish goals and or (3) objectives g. defined criteria for future evalua-600.67 (b) 27-37 tion of housing programs and activities h. indication of distribution of housing 600.70 (b), (2) 27-37 resources (assisted and non-assisted) or (3) by range of housing types i. environmental assessment 600.65 (b) 39-40 600.66 (d) 41 j. historic preservation assessment

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